

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	CHAPTER 11
)	
W.R. GRACE & CO., <i>et al.</i> ,)	Case No. 01-01139 (JKF)
)	(Jointly Administered)
Debtors.)	
)	Re: Docket No. 26245

**MOTION FOR EXPEDITED
CONSIDERATION OF ANDERSON MEMORIAL
HOSPITAL'S MOTION (1) TO EXTEND TIME FOR
FILING OBJECTIONS, TO EXTENT APPLICABLE;
AND (2) TO CLARIFY TIME FOR FILING NOTICE OF
APPEAL, TO EXTENT APPLICABLE, WITH RESPECT TO
MEMORANDUM OPINION AND RECOMMENDED FINDINGS
OF FACT, CONCLUSIONS OF LAW AND ORDER REGARDING
CONFIRMATION OF FIRST AMENDED PLAN OF REORGANIZATION**

Anderson Memorial Hospital ("Anderson"), through undersigned counsel, moves for expedited consideration (the "Motion to Expedite") of its above-referenced Motion to Extend Time for Filing Objections, to Extent Applicable; and (2) to Clarify Time for Filing Notice of Appeal, to Extent Applicable, With Respect to Memorandum Opinion and Recommended Findings of Fact, Conclusions of Law and Order Regarding Confirmation of First Amended Plan of Reorganization (the "Motion to Extend").

1. L.B.R. 9006-1(e) provides that the Court may shorten notice "on written motion (served on all interested parties) specifying the exigencies justifying shortened notice."

2. The Motion to Extend seeks to extend the time for filing objections to the Court's *Memorandum Opinion Regarding Objections to Confirmation of First Amended Joint Plan of Reorganization and Recommended Supplemental Findings of Fact and Conclusions of Law* ("Memorandum Opinion," D.I. 26154) and *Recommended Findings of Fact, Conclusions of Law and Order Regarding Confirmation of First Amended Joint Plan of Reorganization* ("Recommended Findings," D.I. 26155), to the extent such deadline is applicable, and to clarify

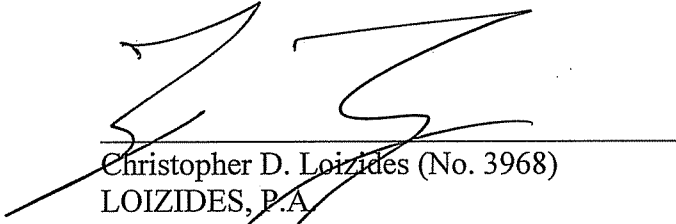
that the time for filing a notice of appeal, to the extent applicable, is tolled by the Plan Proponents' filing of their Motion for Clarification of Confirmation Order pursuant to Fed. R. Bankr. P. 9006(b) and 9033(c) (D.I. 26236).

3. As the deadline to appeal and/or file objections to the Memorandum Opinion and Recommended Findings is Monday, February 14, 2011, Movant requests expedited consideration of the Motion to Extend.

4. This Court has scheduled an expedited hearing on the related Precautionary Motion of AXA Belgium, as successor to Royale Beige SA for Extension of Time to File Objections to or Appeal from Memorandum Opinion and Recommended Findings of Fact and Conclusions of Law of Bankruptcy Judge (D.I. 26238) for Monday, February 14, 2011 at 9:00 a.m. In the interests of judicial economy, Movant requests that the Motion be heard at the same time.

WHEREFORE, Anderson respectfully requests that this Court grant the relief requested herein, enter an Order in the form annexed hereto and grant the Anderson such other and further relief as is just.

DATED: February 11, 2011



Christopher D. Loizides (No. 3968)
LOIZIDES, P.A.
1225 King Street, Suite 800
Wilmington, DE 19801
Telephone: (302) 654-0248
Facsimile: (302) 654-0728
Email: loizides@loizides.com

- and -

Daniel A. Speights
C. Alan Runyan
SPEIGHTS & RUNYAN
200 Jackson Avenue East
Post Office Box 685
Hampton, SC 29924
Telephone: (803) 943-4444
Facsimile: (803) 943-4599

- and -

John W. Kozyak
David L. Rosendorf
KOZYAK TROPIN & THROCKMORTON,
P.A.
2525 Ponce de Leon, 9th Floor
Coral Gables, FL 33134
Telephone: (305) 372-1800
Facsimile: (305) 372-3508

Counsel for Anderson Memorial Hospital